

# EXHIBIT C

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**From:** Vanderwal, Amy E. <avanderwal@bakerlaw.com>  
**Sent:** Thursday, June 22, 2017 5:00 PM  
**To:** Helen Chaitman  
**Cc:** Brown, Seanna R.; Hoang, Lan; Woltering, Catherine E.  
**Subject:** PW - deposition of Robert Blecker

Dear Helen,

I write in connection with my May 24, 2017 letter (the "Trustee's Letter") responding to your May 8, 2017 email indicating that Robert Blecker has information relevant to his father, Aaron Blecker's, BLMIS account and raising the possibility of taking Robert Blecker's deposition. The Trustee's Letter explained that we could not schedule Robert Blecker's deposition until we had received:

(1) a physician's affidavit detailing Aaron Blecker's unavailability to testify at the omnibus evidentiary hearing based on health or age—which you offered to provide to the Court during the April 18, 2017 hearing on the Motions *in Limine*; and

(2) a proffer detailing Robert Blecker's proposed testimony and the basis for his personal knowledge.

It has been four weeks and we have received no response from you. The Trustee's position remains the same as laid out in his Letter and we would like to resolve this issue as soon as possible. To that end, we ask for your response in the next ten days.

Regards,  
Amy

**Amy Vanderwal**  
Partner

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**BakerHostetler**

45 Rockefeller Plaza  
New York, NY 10111-0100  
T +1.212.589.4612

avanderwal@bakerlaw.com  
bakerlaw.com



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